

**IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF MISSOURI  
WESTERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

LEONARDO LEON

Defendant.

Criminal No. 24-00257-01-CR-W-HFS  
Complaint No. 24-MJ-00134-LMC

**MOTION TO DISMISS COMPLAINT**

Comes now Kenneth W. Borgnino, Assistant United States Attorney, and moves the Court to dismiss the complaint filed on October 14, 2024, before United States Magistrate Judge W. Brian Gaddy, at Kansas City, Missouri, charging the defendant, LEONARDO LEON, with Count One, production of child pornography, in violation of Title 18, United States Code, Section 2251 (a),(e), and Count Two, distribution of child pornography, in violation of Title 18, United States Code, Section 2252 (a)(2), (b)(1).



Kenneth W. Borgnino  
Assistant United States Attorney  
Western District of Missouri

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing was delivered on November 13, 2024, to the CM-ECF system of the United States District Court for the Western District of Missouri for electronic delivery to all counsel of record.

/s/Kenneth W. Borgnino

Kenneth W. Borgnino  
Assistant United States Attorney